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Counsel for Defendant Ryan Cardenas

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

United States of America,
Plaintiff,
v.
Ryan Cardenas,
Defendants.

Case Number: CR 15-392 RS

**Joint Stipulation and [Proposed]
Order Continuing January 26, 2016,
Hearing Date to February 16, 2016**

Date: January 26, 2016
Time: 2:30 p.m.

STIPULATION

Defendant Ryan Cardenas is currently set for status hearing before the Court on January 26, 2016.

Government counsel has recently extended an offer for Mr. Cardenas in this case regarding three counts of Bank Fraud in violation of 18 USC § 1344; one count of Aggravated Identity Theft in violation of 18 USC §1028A; two counts of Forged Securities in violation of 18 USC 513(a); and one count of Unlawful Possession of United States Mail. Counsel requests additional time to resolve the pending plea offer and finalize details of the plea.

1 Accordingly, counsel jointly request a continuance of the presently set status hearing from January
2 26, 2016, at 2:30 p.m., to **February 16, 2016, at 2:30 p.m.**

3 Additionally, the parties jointly request an exclusion of time under the Speedy Trial Act from
4 January 26, 2016, to February 16, 2016—as failure to grant a continuance would unreasonably deny the
5 Mr. Cardenas the reasonable time necessary for effective preparation, taking into account the exercise of
6 due diligence. *See* 18 U.S.C. § 3161(h)(6) and (h)(7).

7 SO STIPULATED.
8

9 Dated: January 25, 2016

10 */s/ Benjamin Kingsley*
11 BENJAMIN KINGSLEY
12 Assistant United States Attorney

13 Dated: January 25, 2016

14 */s/ Candis Mitchell*
15 CANDIS MITCHELL
16 Attorney for Defendant Cardenas

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18 [Proposed] Order

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20 For the reasons stated above, the Court continues the status hearing date from January 26, 2016,
21 at 2:30 p.m., to **February 16, 2016, at 2:30 p.m.** Time is ordered excluded from January 26, 2016, to
22 February 16, 2016, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(6) and (h)(7).
23

24 SO ORDERED.

25 Dated: 1/26/16



26
27

28 Honorable Richard Seeborg
Jt. Stip. Cont. Hearing & [Prop.] Order
CR 15-392 RS